

# **EXHIBIT G**

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*RIMINI STREET, INC. and SETH RAVIN*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANT RIMINI STREET INC.'S  
FIRST SUPPLEMENTAL RESPONSE  
TO PLAINTIFF ORACLE USA, INC.,  
AMERICA, INC., AND ORACLE  
INTERNATIONAL CORPORATION'S  
FIFTH SET OF INTERROGATORIES  
TO DEFENDANT RIMINI STREET**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Rimini Street, Inc. ("Rimini Street") provides the following responses to Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.'s ("Oracle" or "Plaintiff") Fifth Set of Interrogatories.



1  
2 Regarding "use [of an environment] for a customer other than the specific customer", Rimini  
3 does not maintain records of usage of environments on a customer-by-customer basis, though it does  
4 have records that show usage of environments generally. For instance, Ms. Beth Lester testified  
5 extensively during her deposition pursuant to Fed. R. Civ. P. 30(b)(6) on March 17, 2011 regarding  
6 documentation reflecting usage of Rimini's environments in connection with Rimini's development  
7 efforts. Specifically, Ms. Beth Lester described: the records maintained in Rimini's DevTrack  
8 platform, which identify the environments used to develop and test updates (*see, e.g.*, Lester 30(b)(6)  
9 Dep. at 81:6-82:20, 120:5-138:10; Lester 30(b)(6) Exhibits 75, 76); the HRMS Development folders,  
10 which indicate the clients receiving updates and the various versions thereof (*see, e.g.*, Lester  
11 30(b)(6) Dep. at 82:22-83:23, 100:6-101:21, 132:11-17, 156:4-17, 160:10-182:25; Lester 30(b)(6)  
12 Dep. Exhibit 78, 80); the HRMS Functional folder, which includes test documents reflecting  
13 environments used in the testing of updates (*see, e.g.*, Lester 30(b)(6) Dep. at 82:22-83:23, 240:25-  
14 241:4); and the technical and functional specifications for Rimini's updates, which may indicate  
15 environments used in the development of an update (*see, e.g.*, Lester 30(b)(6) Dep. at 24:20-25,  
16 83:24-88:25, 128:24-129:6, 191:22-192:17, 195:12-200:20, 219:5-221:15, 225:8-12, 228:10-230:11,  
17 245:14-251:15, 255:12-256:12; Lester 30(b)(6) Dep. Exhibits 81, 89, 91, 96, 97). Ms. Susan  
18 Tahtaras also testified that these and other records may indicate environment usage. For instance,  
19 Ms. Tahtaras described: the records maintained in Rimini's DevTrack platform regarding  
20 development usage of environments (*see, e.g.*, Tahtaras Dep. at 215:24-216:4); the records included  
21 in the Project Plan and Project Checklist archives indicating environment usage (*see, e.g.*, Tahtaras  
22 Dep. at 252:8-254:14); and Environment\_Request records indicating environment usage (*see, e.g.*,  
23 Tahtaras Dep. at 250:24-251:6). Each of the described sources have be produced or otherwise made  
24 available to Oracle, and, thus, Rimini has produced documents pursuant to Federal Rule of Civil  
25 Procedure 33(d) from which the answer to this Interrogatory can be ascertained.  
26

27 **INTERROGATORY NO. 24:**  
28



1 Identify every copy of any Software and Support Material that is or has at any time been  
 2 stored at each Non-Customer Location, and the Non-Customer location where it was stored. If any  
 3 Non-Customer Locations have existed for which you cannot identify any particular Software and  
 4 Support Material stored at that location, Identify each such Non-Customer Location.

5 **ORIGINAL ANSWER (July 11, 2011):**

6 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome to the  
 7 extent it seeks information for “any” materials that “is or has at any time” stored in the various  
 8 identified locations. Rimini Street objects to this interrogatory to the extent it seeks information that  
 9 is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the term  
 10 “Non-Customer Location,” and Oracle’s definition of this term, as vague, ambiguous, overbroad and  
 11 unduly burdensome. Accordingly, and without conceding that Oracle’s Specified Locations meet  
 12 Oracle’s definition of Non-Customer Locations, Rimini will provide an answer for the Oracle  
 13 Specified Locations. Rimini Street further objects to this interrogatory on the grounds that it would  
 14 require Rimini Street to create a compilation, abstract, or summary from documents that Rimini  
 15 Street has produced or will produce to Plaintiffs.

16 Subject to and without waiver of the foregoing general and specific objections, Rimini Street  
 17 responds as follows:

18 Rimini responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has  
 19 produced and/or will produce documents from which the answer to this Interrogatory can be  
 20 ascertained, including but not limited to the following:

21 Exhibit 3, which lists Bates-numbers for documents regarding the Oracle Specified  
 22 Locations. More specifically, the documents identified by Exhibit 3 indicate the contents of the  
 23 Oracle Specified Locations, as well as use of such information.

24 **FIRST SUPPLEMENTAL ANSWER (September 8, 2011):**

25 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome to the  
 26 extent it seeks information for “any” materials that “is or has at any time” stored in the various  
 27 identified locations. Rimini Street objects to this interrogatory to the extent it seeks information that  
 28

1 is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the term  
2 “Non-Customer Location,” and Oracle’s definition of this term, as vague, ambiguous, overbroad and  
3 unduly burdensome. Accordingly, and without conceding that Oracle’s Specified Locations meet  
4 Oracle’s definition of Non-Customer Locations, Rimini will provide an answer for the Oracle  
5 Specified Locations. Rimini will further provide an answer with respect to network and local  
6 computer locations that, at any time, were intended for use, or were regularly used as, repositories of  
7 Oracle Software and Support Materials that are not associated with a specific customer. Rimini  
8 Street further objects to this interrogatory on the grounds that it would require Rimini Street to create  
9 a compilation, abstract, or summary from documents that Rimini Street has produced or will produce  
10 to Plaintiffs.

11 Subject to and without waiver of the foregoing general and specific objections, Rimini Street  
12 further responds as follows:

13 Rimini identifies the following as locations that currently or at one time included Oracle  
14 Software and Support Materials:

15 \\rsi-clsvr01\client\_software\PeopleSoft;

16 \\rsi-clsvr01\internal\_software;

17 \\rsi-data01\share\client\_archives\ftp.peoplesoft.com;

18 \\rsi-data01\share\software\oracle;

19 \\rsi-data01\share\software\PeopleSoft;

20 \\rsi-clsvr01\fileshare\software\Peoplesoft;

21 \\rsi-clsvr01\client\_software\For Development Use Only; and

22 \\rsi-clsvr03\d01\install.

23 The location \\rsi-clsvr01\client\_software\PeopleSoft has included materials relating to  
24 PeopleSoft software. In the past, certain materials at this location may have been used in building  
25 environments for a particular client after Rimini verified that the particular client was entitled to  
26 these certain materials.



1 The location \rsi-clsvr01\internal\_software was a parent directory with subdirectories that  
2 have included installation materials relating to PeopleSoft software and Oracle Database software. In  
3 the past, certain materials at this location may have been used in building environments for a  
4 particular client after Rimini verified that the particular client was entitled to these certain materials.

5 The location \rsi-clsvr03\d01\install has included Software and Support Materials. In the  
6 past, certain materials at this location may have been used in building environments for a particular  
7 client after Rimini verified that the particular client was entitled to these certain materials.

8 The location \rsi-data01\share\client\_archives\\_ftp.peoplesoft.com has included materials  
9 obtained from PeopleSoft's FTP website. This location was, at one time, intended to be used as a  
10 repository for materials for clients that had the right to access such materials through PeopleSoft's  
11 FTP site.

12 The location \rsi-data01\share\software\oracle has included materials relating to Oracle  
13 Database software.

14 The location \rsi-data01\share\software\PeopleSoft has included materials relating to  
15 PeopleSoft software.

16 The location \rsi-clsvr01\client\_software\For Development Use Only has included materials  
17 relating to Oracle Software and Support Materials. Oracle has had access to this location via VPN  
18 for some time.

19 The address \rsi-clsvr01\fileshare\software\Peoplesoft provides a link to \rsi-  
20 clsvr01\client\_software\PeopleSoft, which may include Software and Support materials and  
21 described above. Additionally, the address 10.12.1.5 is the IP Address for \rsi-clsvr01, which may  
22 include Software and Support materials as described above.

23 Rimini further responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has  
24 produced and/or will produce documents from which the answer to this Interrogatory can be  
25 ascertained, including but not limited to the following:

1 Exhibit 3-1, which lists Bates-numbers for documents regarding the Oracle Specified  
2 Locations. More specifically, the documents identified by Exhibit 3-1 indicate the contents of the  
3 Oracle Specified Locations, as well as use of such information.

4 The documents spanning Bates-range RSI02971994-2158, which are Build Requests that  
5 may indicate the sources for environment builds.

6  
7 **INTERROGATORY NO. 25:**

8 For every copy of Software and Support Materials identified in your Response to  
9 Interrogatory No. 24, describe each instance in which the copy of Software and Support Materials  
10 was copied or used for a customer other than the specific customer, if any, from which or on whose  
11 behalf You claim to have obtained the Software and Support Materials that was copied or used. If  
12 you do not claim to have obtained a copy of Software and Support Materials indentified in your  
13 Response to Interrogatory No. 24 from or on behalf of a specific customer, describe each instance in  
14 which that copy of Software and Support Materials was copied or used.

15 **ORIGINAL ANSWER (July 11, 2011):**

16 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome. Rimini  
17 Street objects to this interrogatory to the extent it seeks information that is not within the possession,  
18 custody, or control of Rimini Street. Rimini Street objects to the phrases "Non-Customer Location,"  
19 and "used for a customer other than the specific customer" on the grounds and to the extent they are  
20 vague and ambiguous. Rimini Street further objects to this interrogatory on the grounds that it  
21 would require Rimini Street to create a compilation, abstract, or summary from documents that  
22 Rimini Street has produced or will produce to Plaintiffs.

23 Subject to and without waiver of the foregoing general and specific objections, Rimini Street  
24 responds as follows:

25 Rimini further responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has  
26 produced and/or will produce documents from which the answer to this Interrogatory can be  
27 ascertained, including but not limited to the following:



Exhibit 3, which lists Bates-numbers for documents regarding the Oracle Specified Locations. More specifically, the documents identified by Exhibit 3 indicate the contents of the Oracle Specified Locations, as well as use of such information.

**FIRST SUPPLEMENTAL ANSWER (September 8, 2011):**

Rimini Street objects to this Interrogatory as overly broad and unduly burdensome. Rimini Street objects to this interrogatory to the extent it seeks information that is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the phrases “Non-Customer Location,” and “used for a customer other than the specific customer” on the grounds and to the extent they are vague and ambiguous. Rimini will further provide an answer with respect to network and local computer locations that, at any time, were intended for use, or were regularly used as, repositories of Oracle Software and Support Materials that are not associated with a specific customer. Rimini Street further objects to this interrogatory on the grounds that it would require Rimini Street to create a compilation, abstract, or summary from documents that Rimini Street has produced or will produce to Plaintiffs.

Subject to and without waiver of the foregoing general and specific objections, Rimini Street further responds as follows:

Rimini identifies the following as locations that currently or at one time included Oracle Software and Support Materials:

\\rsi-clsvr01\client\_software\PeopleSoft;

\\rsi-clsvr01\internal\_software;

\\rsi-data01\share\client\_archives\ftp.peoplesoft.com;

\\rsi-data01\share\software\oracle;

\\rsi-data01\share\software\PeopleSoft;

\\rsi-clsvr01\fileshare\software\Peoplesoft;

\\rsi-clsvr01\client\_software\For Development Use Only; and

\\rsi-clsvr03\d01\install.



1 The location \rsi-clsvr01\client\_software\PeopleSoft has included materials relating to  
2 PeopleSoft software. In the past, certain materials at this location may have been used in building  
3 environments for a particular client after Rimini verified that the particular client was entitled to  
4 these certain materials.

5 The location \rsi-clsvr01\internal\_software was a parent directory with subdirectories that  
6 have included installation materials relating to PeopleSoft software and Oracle Database software. In  
7 the past, certain materials at this location may have been used in building environments for a  
8 particular client after Rimini verified that the particular client was entitled to these certain materials.

9 The location \rsi-clsvr03\d01\install has included Software and Support Materials. In the  
10 past, certain materials at this location may have been used in building environments for a particular  
11 client after Rimini verified that the particular client was entitled to these certain materials.

12 The location \rsi-data01\share\client\_archives\\_ftp.peoplesoft.com has included materials  
13 obtained from PeopleSoft's FTP website. This location was, at one time, intended to be used as a  
14 repository for materials for clients that had the right to access such materials through PeopleSoft's  
15 FTP site.

16 The location \rsi-data01\share\software\oracle has included materials relating to Oracle  
17 Database software.

18 The location \rsi-data01\share\software\PeopleSoft has included materials relating to  
19 PeopleSoft software.

20 The location \rsi-clsvr01\client\_software\For Development Use Only has included materials  
21 relating to Oracle Software and Support Materials. Oracle has had access to this location via VPN  
22 for some time.

23 The address \rsi-clsvr01\fileshare\software\Peoplesoft provides a link to \rsi-  
24 clsvr01\client\_software\PeopleSoft, which may include Software and Support materials and  
25 described above. Additionally, the address 10.12.1.5 is the IP Address for \rsi-clsvr01, which may  
26 include Software and Support materials as described above.

1 Rimini further responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has  
2 produced and/or will produce documents from which the answer to this Interrogatory can be  
3 ascertained, including but not limited to the following:

4 Exhibit 3-1, which lists Bates-numbers for documents regarding the Oracle Specified  
5 Locations. More specifically, the documents identified by Exhibit 3-1 indicate the contents of the  
6 Oracle Specified Locations, as well as use of such information.

7 The documents spanning Bates-range RSI02971994-2158, which are Build Requests that  
8 may indicate the sources for environment builds.

9  
10  
11  
12 Dated: September 8, 2011

13 /s/ Robert H. Reckers

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